

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

Priscilla Sterling, Raine Becker, Shawn Miller, and John Bennett, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

The City of Jackson, Mississippi; Chokwe A. Lumumba; Tony Yarber; Kishia Powell; Robert Miller; Jerriot Smash; and Trilogy Engineering Services LLC,

Defendants.

Civil No. 3:22-cv-00531-KHJ-MTP

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiffs respectfully move to extend the deadline for filing their opposition brief to the City of Jackson's Motion to Dismiss the Second Amended Complaint (Dkt. 107) to April 5, 2024.

The City of Jackson ("the City") filed its Motion to Dismiss the Second Amended Complaint in this matter on March 14, 2024. Under Civil Local Rule 7(b)(4), the deadline for Plaintiffs to respond to the City's motion would otherwise be March 28, 2024.

Plaintiffs have requested, and the City has agreed, that Plaintiffs may have an additional eight (8) days to file their response brief. Counsel for the City of

Jackson has authorized the undersigned to represent that the City does not oppose this motion for extension of time.

This motion is made to provide Plaintiffs adequate time to respond to the City's motion in light of counsel's pending obligations in other litigation. This request will not prejudice any party or delay these proceedings. Undersigned counsel does not anticipate requesting any further extension.

Should the Court grant this motion, Plaintiffs' response brief would be due on April 5, 2024, and the City's rebuttal brief would be due on April 12, 2024.

Given the length and nature of this motion, Plaintiffs request that the Court waive the customary requirement of a separate memorandum brief.

Dated: March 25, 2024

/s/ Mark P. Chalos

Mark P. Chalos (*Pro Hac Vice*)

Lead Counsel

Lieff Cabraser Heimann & Bernstein, LLP

222 2nd Avenue South, Suite 1640

Nashville, TN 37201-2379

Telephone: 615-313-9000

Facsimile: 615-313-9965

mchalos@lchb.com

Robert L. Gibbs (Bar No. 4816)

Gibbs Travis PLLC

210 East Capitol Street, Suite 1801

Jackson, MS 39201

Telephone: 601-487-2640

Fax: 601-366-4295

rgibbs@gibbstavis.com

Tiseme G. Zegeye (*Pro Hac Vice*)
Amelia A. Haselkorn (*Pro Hac Vice*)
Lieff Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-956-1000
Facsimile: 415-956-1008
tzegeye@lchb.com
ahaselkorn@lchb.com

Stuart C. Talley (*Pro Hac Vice*)
Kershaw Talley Barlow, P.C.
401 Watt Avenue, Suite 1
Sacramento, CA 95864
Telephone: 916-779-7000
stuart@ktblegal.com

Larry Moffett (Bar No. 3401)
Law Office of Larry D. Moffett PLLC
P.O. Box 1418
39 CR 231
Oxford, MS 38655
Telephone: 662-298-4435
larry@larrymoffett.com

Attorneys for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2024, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which served a copy of the foregoing on all counsel of record.

/s/ Amelia A. Haselkorn

Amelia A. Haselkorn